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*Counsel for Plaintiffs
Signify North America Corporation
and Signify Holding B.V.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SIGNIFY NORTH AMERICA CORPORATION and
SIGNIFY HOLDING B.V.

Plaintiffs,

v.

LEPRO INNOVATION INC,
LE INNOVATION INC,
INNOVATION RULES INC.,
HOME EVER INC., and
LETIANLIGHTING, INC.,

Defendants.

Case 2:22-cv-02095-JAD-EJY

**JOINT STIPULATION AND
ORDER TO EXTEND
DEADLINE IN REVISED
SCHEDULING ORDER**

(Sixth Requested Extension)

This is a patent-infringement suit over LED lighting products. Plaintiffs Signify North America Corporation and Signify Holding B.V. (collectively, “Plaintiffs”) allege that Defendants Lepro Innovation Inc., LE Innovation Inc., Innovation Rules Inc., Home Ever Inc., and Letianlighting Inc. (collectively, “Defendants”) infringe six of Signify’s patents covering various LED technologies.

The parties have been working diligently and cooperatively to meet the Court’s deadlines. There is one remaining expert deposition to be conducted: the deposition of Defendants’ lone technical expert witness, Dr. Curran. The Court previously granted Signify’s Motion for Extension (ECF No. 151) to take Dr. Curran’s deposition until 15 days after the Court rules on Signify’s Motion to Compel a Full and Fair Examination of Defendants’ Sole Technical Expert Witness (“Motion to Compel”) (ECF No. 135). A hearing is set on the Motion to Compel before the Honorable Magistrate Judge Elayna J. Youchah on Friday, October 4, 2024, at 10:00 a.m. With respect to scheduling Dr. Curran’s deposition, the parties have set aside the dates of October 15-17, 2024, pending the Court’s ruling on Signify’s Motion to Compel. Given that these reserved dates are right before the current deadline of October 18, 2024, for dispositive motions, the parties have mutually agreed and respectfully seek the Court’s permission to extend this deadline by one week as follows in the operative scheduling order (ECF No. 132)¹:

<u>Event</u>	<u>Current Date</u>	<u>New Agreed Date</u>
Dispositive Motion Deadline	October 18, 2024	October 25, 2024

The parties respectfully submit that good cause exists to extend these deadlines for the reasons set forth herein. Pursuant to Local Rule 26-3, the following information is provided:

¹ On December 21, 2023, the parties filed a joint stipulation and order to extend certain discovery deadlines (ECF No. 100), which was granted on December 28, 2023 (ECF No. 103). On February 1, 2024, the parties filed a joint stipulation and order to extend certain discovery deadlines (ECF No. 119), which was granted on February 2, 2024 (ECF No. 120). On April 23, 2024, the parties filed a joint stipulation and order to extend certain discovery deadlines (ECF No. 121), which was granted the same day (ECF No. 122). On June 11, 2024, the parties filed a joint stipulation and order to extend certain discovery deadlines (ECF No. 127), which was granted the same day (ECF No. 128). On July 16, 2024, the parties filed a joint stipulation and order to extend one discovery deadline (ECF No. 131), which was granted the next day (ECF No. 132).

1 (a) **A statement specifying the discovery completed.**

2 The parties have served and responded to written discovery.

3 On March 20, 2023, Plaintiffs served a first set of interrogatories and a first set of
4 documents requests.

5 On April 3, 2023, the parties served Rule 26(a) initial disclosures.

6 On April 26, 2023, Defendants served responses to Plaintiffs' first set of interrogatories
7 and first set of document requests.

8 On May 26, 2023, Defendants served a first set of interrogatories and a first set of
9 document requests.

10 On June 26, 2023, Plaintiffs served responses to Defendants first set of interrogatories and
11 first set of document requests.

12 On October 27, 2023, Plaintiffs served a second set of document requests.

13 On November 15, 2023, Plaintiffs served a third set of document requests.

14 On November 27, 2023, Defendants served responses to Plaintiffs' second set of document
15 requests.

16 On December 15, 2023, Defendants served responses to Plaintiffs' third set of document
17 requests.

18 On December 15, 2023, Plaintiffs served a second set of interrogatories.

19 On January 15, 2024, Defendants served responses to Plaintiffs' second set of
20 interrogatories.

21 The parties have produced documents in response to each other's document requests. To
22 date, Plaintiffs have produced 92,659 pages of documents, Defendant LEPRO Innovation Inc. has
23 produced 1,550 pages of documents, Defendant LE Innovation Inc has produced 14 pages of
24 documents, Defendant Innovation Rules Inc. has produced 44,821 pages of documents, Defendant
25 Home Ever Inc. has produced 473 pages of documents, Defendant Letianlighting, Inc. has
26 produced 31,399 pages of documents, and Defendants have collectively produced an additional
27 8,535 pages of documents.

1 A deposition of Signify's technical expert, Dr. Regan Zane, was completed on August 25,
2 2023, in connection with the parties' claim construction briefing.

3 Defendants conducted depositions of four named inventors of the Patents-in-suit, Matthias
4 Wendt and Reinhold Elferich, on January 7 and 9, 2024, Martijn Lankhorst and Patrick Van
5 Kooten, on February 7 and 9, 2024. The witnesses and Plaintiffs' counsel for these depositions
6 were in Eindhoven, The Netherlands.

7 In addition, the following depositions of Defendants' witnesses were conducted by
8 Plaintiffs on January 15-25, 2024:

- 9 1) Rule 30(b)(6) deposition of Defendant LEPRO Innovation Inc.
- 10 2) Rule 30(b)(6) deposition of Defendant LE Innovation Inc.
- 11 3) Rule 30(b)(6) deposition of Defendant Innovation Rules Inc.
- 12 4) Rule 30(b)(6) deposition of Defendant Home Ever Inc.
- 13 5) Rule 30(b)(6) deposition of Defendant Letianlighting, Inc.
- 14 6) Individual deposition of Weiqiao Xun
- 15 7) Individual deposition of Litao Xu
- 16 8) Individual deposition of Ji Wu

17 Furthermore, the following depositions of Plaintiffs were conducted by Defendants on
18 April 17 and 18, 2024:

- 19 1) Rule 30(b)(6) deposition of Plaintiff Signify North America Corporation
- 20 2) Rule 30(b)(6) deposition of Signify Holding B.V.

21 Additionally, the following depositions of Defendants' witnesses were conducted by
22 Plaintiffs on April 23-24 and May 7-8, 2024:

- 23 1) Individual deposition of Zhikang Huang
- 24 2) Individual deposition of Tianying Li

25 Finally, the parties have conducted the following expert depositions:

- 26 1) Dr. Jonathan Wood (Signify's technical expert)
- 27 2) Dr. Morgan Pattison (Signify's technical expert)

- 3) Dr. Regan Zane (Signify's technical expert)
- 4) Dr. David Ricketts (Signify's technical expert)
- 5) Dr. Michael Krames (Signify's technical expert)
- 6) Todd Schoettelkotte (Signify's damages expert)
- 7) David Duski (Defendants' damages expert)

(b) A specific description of the discovery that remains to be completed.

There is one remaining expert deposition to be conducted: the deposition of Defendants' technical expert witness, Dr. Curran.

(c) The reasons why the deadline was not satisfied or the remaining discovery was not completed within the time limits set by the discovery plan.

All previous case deadlines have been met. There is one remaining expert deposition to be conducted: the deposition of Defendants' technical expert witness, Dr. Curran. The Court previously granted Signify's Motion for Extension (ECF No. 151) to take Dr. Curran's deposition until 15 days after the Court rules on Signify's Motion to Compel (ECF No. 135). A hearing is set on the Motion to Compel before the Honorable Magistrate Judge Elayna J. Youchah on Friday, October 4, 2024 at 10:00 a.m. With respect to scheduling Dr. Curran's deposition, the parties have set aside the dates of October 15-17, 2024, pending the Court's ruling on Signify's Motion to Compel. Given that these reserved dates are right before the current deadline of October 18, 2024 for dispositive motions, the parties have mutually agreed and respectfully seek the Court's permission to extend this deadline by one week to October 25, 2024.

(d) A proposed schedule for completing all remaining discovery.

The parties jointly propose the following amended deadline:

<u>Event</u>	<u>Current Date</u>	<u>New Agreed Date</u>
Dispositive Motion Deadline	October 18, 2024	October 25, 2024

1 **(e) Good Cause Exists for Extending the Subject Deadlines Above.**

2 Good cause exists for the requested relief. The requested extension is brief (seven (7) days)
3 and is needed to allow the parties sufficient time to meet the Dispositive Motion Deadline
4 following the deposition of Dr. Curran. For the reasons set forth above, the parties respectfully
5 submit that good cause exists to extend the Dispositive Motion Deadline by one week.

6 WHEREFORE, the parties hereby respectfully request that the Court enter an order
7 extending the deadline as set forth above.

Dated: October 3, 2024

Respectfully submitted,

/s/ F. Christopher Austin

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**IT IS SO ORDERED; provided, however,
that no further extensions of discovery will
be granted and no change to the dispositive
motion deadline is made.**


U.S. MAGISTRATE JUDGE

Date: October 4, 2024